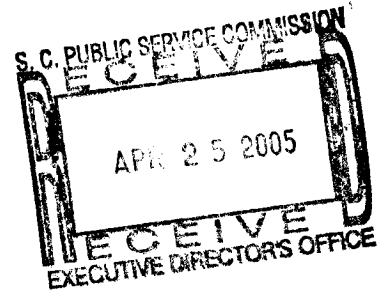


BRICKFIELD BURCHETTE
RITTS & STONE, PC

WASHINGTON, D.C.
AUSTIN, TEXAS

April 22, 2005

Mr. Charles L.A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Dr., Suite 100
Columbia, SC 29210



Re: Carolina Power & Light Company d/b/a Progress Energy Carolinas, Inc. –
Annual Review of Base Rates for Fuel Costs.
Docket No. 2005-1-E

Dear Mr. Terreni:

Please find enclosed a copy of the Nucor Steel-South Carolina's First Set of Data Requests which was served on counsel for the Applicant. Please date stamp the extra copy and return it to me in the enclosed postage pre-paid envelope.

Please let me know if you have any questions.

Sincerely,

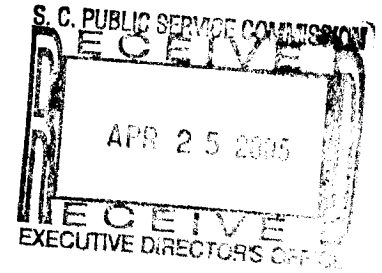
Garrett A. Stone
D. Cameron Prell

Enclosures

cc: Len S. Anthony, Esq.
Florence P. Belser, Esq.
Wendy B. Cartledge, Esq.
Benjamin P. Mustian, Esq.
Scott Elliott, Esq.

**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2005-1-E



In the Matter of:)	
)	
Carolina Power & Light Company d/b/a)	NUCOR-STEEL
Progress Energy Carolinas, Inc.)	SOUTH CAROLINA'S
Annual Review of Base Rates)	FIRST SET OF
For Fuel Costs)	DATA REQUESTS
)	TO PEC

Nucor Steel-South Carolina ("Nucor") hereby propounds the following data requests to Progress Energy Carolinas Inc. ("PEC") and requests that the information and documents requested below be provided within ten (10) days.

INSTRUCTIONS

1. In answering each Request, please state the text of the Request prior to providing the response. Each Request and applicable response should be on a separate page. Where there are subparts to a Request, each subpart and applicable response should be on a separate page. Each Request is continuing in nature. Thus, if PEC acquires or discovers additional or different information with respect to a Request after the Request has been initially answered, PEC is required to supplement its response immediately following the receipt of such additional or different information, giving the additional or different information to the same extent as originally requested. PEC may not postpone serving such responsive supplemental information until after the filing of any testimony or supporting documents in this proceeding. Initial and supplementary responses shall be full, complete and accurate since they will be relied upon by Nucor for the purposes of this proceeding. For each Request, list all assumptions made by PEC in answering said Request.
2. In the event that PEC asserts that any of the information requested is deemed by it to be privileged or proprietary, then PEC in its written response should identify any such data, and any supporting documents, by date and general content. PEC should also identify all persons who participated in the preparation of the document and all persons, inside or outside PEC, who received a copy, read, or examined any such document. In addition, PEC should indicate its claim of privilege with particularity and describe the grounds upon which privilege is claimed. State the present location of the document and all copies thereof and identify each person having custody or control of the document and said copies.
3. To the extent that PEC asserts that any requested information is not relevant or not material to any issue in the above-captioned matter, PEC, in its written response hereto, should indicate a specific basis for said assertion in the context of any issues arising in this proceeding.

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2005-1-E
NUCOR'S FIRST SET OF DATA REQUESTS

4. In the event PEC asserts that any requested information is not available in the form requested, PEC, in its written response thereto, should disclose the following:
 - (a) the form in which the requested data currently exists (identifying documents by title);
 - (b) whether it is possible under any circumstances for PEC to provide the data in the form requested;
 - (c) the procedures or calculation necessary to provide the data in the form requested;
 - (d) the length of time (in hours or days) necessary for PEC to prepare the data in the form requested; and
 - (e) the earliest dates, time period, and location that representatives of Nucor may inspect PEC's files, records or documents in which the requested information currently exists.
5. The Requests contained herein contemplate that individual copies of any documentary material requested will be provided to Nucor as is the usual custom in regulatory proceedings. In the event that PEC asserts that any requested documents are too voluminous, or, for some other reason, that copies cannot be provided, PEC is requested to make this documentary material available for inspection as of the date of the required written responses at such time and place as may be mutually agreed upon among counsel for the parties. PEC is requested to indicate the estimated size of any voluminous documents and provide copying pursuant to Nucor's designation at Nucor's expense at that time.
6. In providing documents, PEC is requested to furnish all documents or items in its physical possession or custody, as well as those materials under the physical possession, custody or control of any other person acting or purporting to act on behalf of PEC or any of PEC's employees or representatives, whether as an agent, independent contractor, attorney, consultant, witness, or otherwise. If documents responsive to a request existed at one time but have been discarded, lost or destroyed, please describe by category such documents, state the identity of the person having knowledge of the circumstances of their discard, loss or destruction, and state the date on which such documents were discarded, lost or destroyed.
7. To the extent any requested document cannot be provided in full, it shall be provided to the extent possible, with an indication of what document or portion of what document is being withheld and the reasons for withholding said document.
8. Documents are to be produced as they are kept in the usual course of business. To the extent that they are attached to each other, documents should not be separated.
9. Documents not otherwise responsive to this Request shall be provided if such documents are attached to documents responsive to this Request, and constitute routing slips, transmittal memoranda, letters, comments, evaluations, or similar materials.
10. For each Request answered, provide the name of the person or persons answering, the title of such persons and the name of the witness or witnesses who will be prepared to testify concerning the matters contained in each response or document provided. PEC shall provide all responses under oath.

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11. Unless otherwise indicated, the following Requests shall require you to furnish information and tangible materials pertaining to, in existence, or in effect for the whole or any part of the period from January 1, 2003, through and including the date of your response.
12. Where these Requests seek quantitative or computational information (*e.g.*, models, analyses, databases, formulas) stored by PEC or its consultants in machine-readable form, in addition to providing a hard copy, PEC is requested to furnish such machine-readable information on CD-ROM in MS Excel file format.
13. To the extent possible, where these Requests seek non-quantitative narrative information (*e.g.*, studies, reports, memorandum, correspondence) stored by PEC or its consultants in machine readable form, in addition to providing a hard copy, PEC is requested to furnish such machine-readable information on CD-ROM in MS Word format.
14. Responses to any of these Requests may include incorporation by reference to responses to other Requests only under the following circumstances:
 - (a) the reference is explicit and complies with instruction 11; and
 - (b) unless the entirety of the referenced response is to be incorporated, the specific information or documents of the referenced response shall be expressly identified.
15. Nucor requests that PEC send by overnight delivery service (such as Federal Express or a comparable service) one copy of its responses to this Request to each of the following:

Garrett A. Stone, Esq.
Brickfield, Burchette, Ritts & Stone, P.C,
1025 Thomas Jefferson Street, NW
Eighth Floor-West Tower
Washington, DC 20007

Thomas S. Mullikin, Esq.
Moore & Van Allen, PLLC
100 North Tryon Street
Suite 4700
Charlotte, NC 28202

Responsive information and documents should be provided as they become available and should not be withheld until a complete response to all of Nucor's requests is available.

DEFINITIONS

1. "PEC" refers to Carolina Power & Light d/b/a Progress Energy Carolinas, Inc., its parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.
2. "PSC" means the South Carolina Public Service Commission.
3. "Nucor" means Nucor Steel-South Carolina.

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4. "Historical period" refers to the monthly fuel costs of PEC between January 1, 2004 and March 31, 2005.
5. "Forecast period" or "projected period" refers to the monthly fuel costs of PEC between April 1, 2005 and June 30, 2006.
6. "Identify" means as follows:
 - (a) when used in reference to an individual, to state his full name and present or last known residence address and telephone number, his present or last known position and business affiliation, and his position and business affiliation at the time in question;
 - (b) when used in reference to a commercial or governmental entity, to state its full name, type of entity (*e.g.*, corporation, partnership, single proprietorship), and its present or last known address;
 - (c) when used in reference to a document, to state the date, author, title, type of document (*e.g.*, letter, memorandum, photograph, tape recording, etc.) and its present or last known location and custodian;
 - (d) when used in reference to a communication, to state the type of communication (*i.e.*, letter, personal conversation, etc.), the date thereof, and the parties thereto and, in the case of a conversation, to state the substance, place, and approximate time thereof, and identity of other persons in the presence of each party thereto; and
 - (e) when used in reference to an act, to state the substance of the act, the date, time, and place of performance, and the identity of the actor and all other persons present.
7. The term "document" as used in the Requests contained herein is used in its customary broad sense, and includes, without limitation, any kind of printed, recorded, written, graphic, or photographic matter and things similar to any of the foregoing, regardless of their author or origin. The term specifically includes reports, studies, statistics, projections, forecasts, decisions and orders, e-mail communications, intra-office and inter-office communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, workpapers, graphs, sketches, computer printouts, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, brochures, bulletins, pamphlets, books, articles, advertisements, circulars, press releases, graphic records or representations or publications of any kind (including microfilm, videotape and records, however produced or reproduced), electronic, mechanical and electrical records of any kind (including, without limitation, tapes, tape cassettes, disks and records), other data compilations (including, without limitation, input/output files, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, disks and recordings used in automated data processing together with the programming instructions and other material necessary to translate, understand or use the same), all drafts, prints, issues, alterations, modifications, changes and amendments to the foregoing, and all other documents or tangible things of whatever description that constitute or contain information within the scope of a Request that are in the possession of PEC. A Request seeking the identification or production of documents addressing, relating or referring to, or discussing a specified matter encompasses documents having a factual, contextual, or logical nexus to the matter, as well as documents making explicit or implicit reference thereto in the body of the documents. Originals and duplicates of the same document

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need not be separately identified or provided; however, drafts of a document or documents differing from one another by initials, interlineations, notations, erasures, file stamps, and the like shall be deemed to be distinct documents requiring separate identification or production.

8. "Communication" shall mean any transmission of information by oral, graphic, written, pictorial, or otherwise perceptible means, including, but not limited to, telephone conversations, letters, telegrams, e-mail and personal conversations. A Request seeking the identity of a communication addressing, relating or referring to, or discussing a specified matter encompasses documents having factual, contextual, or logical nexus to the matter, as well as communications in which explicit or implicit reference is made to the matter in the course of the communication.
9. The "substance" of a communication or act includes the essence, purport or meaning of the same, as well as the exact words or actions involved.
10. Words expressing the singular number shall be deemed to express the plural number; those expressing the masculine gender shall be deemed to express the feminine and neuter genders; those expressing the past tense shall be deemed to express the present tense; and vice versa.
11. The unqualified terms "or" and "and" shall be construed either conjunctively or disjunctively to bring within the scope of these Requests any matters that might otherwise be construed to be outside their scope.
12. The unqualified term "person" shall mean an individual, corporation, partnership, unincorporated association or other business or governmental entity.
13. The term "e.g." or "for example" indicates illustration by example, not limitation.

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QUESTIONS

- NUC-1-1 On a continuing basis, please identify and provide copies of all information provided by PEC to anyone or any party related to this docket including, but not limited to, correspondence, discovery and other requests for data and corresponding responses, oral or written.
- NUC-1-2 Please identify and provide electronic versions (with working formulas) and hard copies of all workpapers used by PEC in connection with this docket or matters related to this docket, including the responses to any discovery from Nucor or any other party.
- NUC-1-3 Please provide the following information for all existing and/or proposed coal contracts that have supplied, or will supply, coal to PEC during the historical and forecast periods.
- (a) The name of the vendor/supplier;
 - (b) The start and end dates of the contract;
 - (c) The contract identification number and status (*i.e.*, executed or in negotiation);
 - (d) For contracts in negotiation, the status of the negotiations and the anticipated completion date;
 - (e) The per unit coal cost and freight costs per the contract;
 - (f) The quality aspects of coal (*e.g.*, sulfur content, etc.) and geographic origin;
 - (g) The “minimum” and “maximum” coal volumes per the contract;
 - (h) The amount of coal anticipated to be delivered under the contract and as relevant the amount of coal actually delivered under contract.
- NUC-1-4 For each month of the historical and forecast periods, please provide all documentation and communications regarding the following:
- (a) Beginning and ending coal inventory in tons;
 - (b) The cost of the coal in PEC’s inventory; and
 - (c) The method for valuing the coal in PEC’s inventory.
- NUC-1-5 Referring to PEC’s purchasing of fuel:
- (a) Please describe in detail PEC’s goals or objectives in purchasing fuel in general and each specific type of fuel in particular;
 - (b) Please explain in detail what PEC is doing to achieve each of those objectives; and
 - (c) Please identify and provide any fuel purchasing policies (for fuel purchases in general and for each specific type of fuel in particular) at PEC that were in effect at any time since January 1, 2003.
 - (d) Please identify and provide all relevant documents.

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- NUC-1-6 To the degree any of PEC's fuel suppliers have become subject to bankruptcy proceedings since January 1, 2003, please:
- (a) Describe in detail and quantify the impact of these proceedings on PEC's cost of fuel for the historical period and separately for the forecast period;
 - (b) Describe in detail PEC's actions to mitigate the impact of these proceedings;
 - (c) Identify and provide all related documents.
- NUC-1-7 Please explain in detail what PEC is doing to ensure the most efficient and/or least cost generation resource mix. Please identify and provide all relevant documents.
- NUC-1-8 Please identify and provide a copy of any internal (or external but done on behalf of PEC) analyses, studies or documents regarding comparisons of:
- (a) generation resource mix among utilities;
 - (b) fuel costs among utilities; and
 - (c) purchased power costs among utilities.
- NUC-1-9 Please explain whether any of PEC's existing long-term or short-term coal supply contracts contain price adjustment clauses. If the answer is yes, please explain the terms of each price adjustment clause and provide all communications and documents related to any price adjustment clause negotiations undertaken by PEC regarding any existing coal supply contract.
- NUC-1-10 Does PEC have any written policies regarding the procurement of fuel (of any type) on the spot market? If so, please provide a copy of all such written policies.
- NUC-1-11 Does PEC, or any of its affiliates, utilize any form of fuel cost hedging? Explain in detail why or why not. If the answer is yes, please provide a detailed explanation of the hedging program(s) as well as the monthly dollar gains and/or losses for such program(s) for the period between January 1, 2003 and March 31, 2005. Please also provide all studies, analyses, and other documentation related to any projected impact(s) of such program(s) on PEC's forecasted fuel procurement costs.
- NUC-1-12 For each fossil and nuclear unit, please provide the availability factor, capacity factor, forced outage rate and heat rate that (a) were experienced during each month between January 2003 and March 2005, and (b) were included during each month of the forecast period. Explain any significant differences between the assumed values during the forecast period and the actual values during the historical period.
- NUC-1-13 Please provide a detailed explanation as to how PEC developed its monthly total system sales for both the historical and forecast period. Identify and provide all documents used in preparing the historical and forecast sales numbers and all related documents.

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- NUC-1-14 Please identify and provide copies of all coal price forecasts (for the type of coal utilized by PEC), including externally generated forecasts, reviewed by PEC personnel during the period from January 1, 2003 through March 31, 2005. Please explain in detail and provide workpapers and related documents that show how these forecasts were used in developing projected coal prices used in projecting the fuel costs for the forecast period.
- NUC-1-15 Please identify and provide any projections of fuel costs (by type of fuel), emission allowance costs and any other costs potentially subject to pass-through in PEC's fuel factor for periods beyond 2006 in the possession of PEC (including any projected fuel factor for these periods). Identify and provide all related documents.
- NUC-1-16 Please describe in detail all actions taken by PEC to reduce or control its escalating fuel costs since January 1, 2004. Provide all specific examples of actions taken and results achieved. Identify and provide all related documents.
- NUC-1-17 Please identify and provide all information supporting:
- (a) PEC's monthly and/or annual budget and forecasted coal prices for each projected period through June 2006. Provide workpapers showing how these numbers were derived. Identify and provide relevant documents.
 - (b) PEC's monthly and/or annual budget and forecasted natural gas prices for each projected period through June 2006. Provide workpapers showing how these numbers were derived. Identify and provide all relevant documents.
- NUC-1-18 Referring to PEC's estimates of monthly and/or annual future fuel costs (for all costs proposed to be passed thorough PEC's fuel factor in South Carolina) for each projected monthly period from April 1, 2005 through June 30, 2006:
- (a) Identify and provide all documents and information used to calculate and support these estimates (this should include, but not be limited to, a listing of the inputs and resulting output of all models used in developing the projections and a description of each model and how it is used in the process);
 - (b) Explain in detail each step of the methodology (by input, *e.g.*, type of fuel, purchased power, transmission expense, emissions allowances, etc.) PEC uses to forecast/project its future monthly fuel cost for SC fuel factor purposes;
 - (c) For each month, explain in detail and provide detailed workpapers showing the estimated fuel cost for each plant, the generation expected from each plant, and how those costs build up to the projected cost in this docket (in a manner similar to how PEC reports its historical monthly fuel costs);

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- (d) For each month, explain in detail and provide detailed workpapers showing the projected cost of purchased power, transmission, and emission allowances, and how those costs build up to the projected cost in this docket; and
- (e) Identify and provide all evidence supporting the use of these projections in this docket.

NUC-1-19 Please identify and provide copies of all internally prepared or externally prepared reports, studies, and analyses relied upon by PEC management personnel during the period January 1, 2003 through March 31, 2005 in making any decisions regarding its fuel and power purchasing practices.

NUC-1-20 Please identify and provide copies of all internally prepared or externally prepared reports, studies, analyses, correspondence, projections or presentations addressing the rising cost of coal between the period January 1, 2003 through March 31, 2005 and expected further price increases in the future.

NUC-1-21 Please identify and describe in detail each change in fuel and power purchasing practice by PEC since January 1, 2004. Identify and provide in detail all related documents.

NUC-1-22 Please provide a list of each of PEC's current generation resources and for each provide the following information:

- (a) Whether the resource is owned or contracted for purchase;
- (b) Whether it is considered a base, intermediate or peaking resource;
- (c) Its nominal or rated capacity;
- (d) Its fuel source;
- (e) Its approximate marginal dispatch rate;
- (f) Its date of commercial operation;
- (g) Its expected remaining contract or expected useful life;
- (h) Documents relevant to the answers to (a) through (g) above.

NUC-1-23 Provide a list of each generating unit owned or controlled by PEC during the period January 1, 2003 through March 31, 2005, and for each such unit for each month during the period, provide the following information:

- (a) the amount of fuel consumed by type;
- (b) the MWh energy generated with each type of fuel;
- (c) the cost of the fuel consumed (by type - if coal, please identify the type(s) of coal that can be burned);
- (d) the average unit cost of the fuel burned by type (per ton for coal, per therm or million btus for gas, and per barrel or gallon for oil); and
- (e) the average unit cost of the fuel burned by type in dollars per MWh.

Please identify and provide relevant documents with respect to each item.

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- NUC-1-24 Please provide a list of each generating unit expected to be owned or controlled by PEC during any of the next three years (2006, 2007 and 2008), separated into those used for regulated (utility) purposes and those used for non-regulated (non-utility) purposes, and for each such unit for each month during the three year period, provide the following information:
- (a) the amount of fuel expected to be consumed by type;
 - (b) the MWh energy expected to be generated with each type of fuel;
 - (c) the cost of the fuel expected to be consumed (by type- if coal, please identify the type(s) of coal that can be burned);
 - (d) the average unit cost of the fuel expected to be burned by type (per ton for coal, per therm or million btus for gas, and per barrel or gallon for oil); and
 - (e) the average unit cost of the fuel expected to be burned by type in dollars per MWh.

Please identify and provide relevant documents with respect to each item.

- NUC-1-25 Please identify and provide copies of presentations made, or provided, to investment analysts, credit rating agencies, research analysts, brokerage firms, or investment banking firms by the personnel of PEC or any of its affiliates during the period January 1, 2003 through March 31, 2005.
- NUC-1-26 Has PEC conducted or had conducted any studies of its fuel and/or purchased power purchasing performance? Please identify and provide a copy of any internal or external analyses of PEC's fuel or purchased power purchasing performance.
- NUC-1-27 Referring to the transmission expenses incurred by PEC that it proposes to include in the fuel factor:
- (a) Identify the South Carolina retail jurisdictional historical period amount for these purchases;
 - (b) Has PEC included projected transmission expenses in its forecast period costs? If so, please identify the South Carolina retail jurisdictional projected period amount for these purchases;
 - (c) Please explain in detail how and why the transmission expenses incurred by PEC during the review period are proposed to be recovered by PEC through the fuel factor rather than base rates (including an explanation of the legal basis for including such costs);
 - (d) Provide a copy of the relevant tariffs and contracts under which PEC has paid or is expected to pay for transmission expenses that it proposes to recover through the fuel factor;
 - (e) Provide a copy of the relevant invoices for transmission service under which PEC has paid or is expected to pay for transmission expenses that it proposes to recover through the fuel factor; and

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- (f) Identify and provide all evidence justifying including these transmission costs in the fuel factor.

NUC-1-28 Referring to the power purchases from AEP Rockport and Broad River:

- (a) Does PEC take the position that either of these power purchases are economy power purchases?
- (b) If so, for the period under review, please explain, support, and provide all evidence or documentation showing the power purchases from Broad River and AEP Rockport were economy purchases.
- (c) Please provide a copy of each power purchase contract.
- (d) Indicate when these power purchases first began and the term for such purchases.
- (e) Does PEC contend that the transmission costs of these purchases should be included in its fuel cost recovery in this docket?
- (f) If so, please explain in detail why and identify and provide all related documents.
- (g) Please provide the amounts of these costs proposed to be recovered from South Carolina ratepayers for the historical period and for the forecast period.

NUC-1-29 For each economy purchase that PEC proposes to include in fuel costs, provide all evidence demonstrating that the purchase:

- (a) Was “made to displace higher cost generation;”
- (b) Was at a “total delivered cost” “which is less than the purchasing utility’s [PEC’s] avoided variable costs for generation of an equivalent quantity of electric power.”

Identify and provide all related documents.

NUC-1-30 (a) Please provide all economy power purchase expenses PEC has included in the forecast period. (b) Identify and provide all documents used to develop this estimate. (c) Provide a detailed estimate of the costs PEC avoided by purchasing economy power during the historical period.

NUC-1-31 Please show the total rate impacts of any proposed increase in fuel factor in this docket:

- (a) on a per-kWh basis for each customer class; and
- (b) on a total-bill monthly basis for each customer class (showing assumed typical monthly usage amounts for each class).

NUC-1-32 Referring to PEC’s removal of off-system sales fuel costs from those fuel costs that it considers recoverable from South Carolina customers (*see* PEC’s Response to ORS Data Request No. 1-22):

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- (a) Please define, support, and provide documentation explaining the method in which fuel costs from PEC's off-system sales are "removed" from those fuel costs it considers recoverable;
- (b) Provide a workpaper showing the removal of such fuel costs;
- (c) Explain in detail how PEC determines the appropriate fuel cost to assign to any off-system sales; and
- (d) Quantify any off-system sales, the price received by PEC for such sales and the fuel costs assigned to such sales during the historical and forecast periods and provide details each sale, the price and the fuel cost assigned.
- (e) Identify and provide all related documents.

NUC-1-33 Referring to PEC's treatment of its experimental real-time pricing rate in which the RTP Hourly Energy Charge is determined by hourly marginal costs (whether in NC or SC):

- (a) For the period under review, please explain, support, and provide all evidence or documentation for how PEC has treated sales and fuel costs for its experimental real-time pricing rate.
- (b) Indicate the RTP Hourly Energy Charge by hour (and the hourly marginal cost used as a basis for that charge, if different) for each hour during the historical period and the number of RTP kWh sold in each such hour;
- (c) Please provide a copy of each real-time pricing tariff and any related documents explaining the operation of the real time pricing program.

NUC-1-34 Referring to PEC's identified fuel costs for May 2004:

- (a) Please explain in detail all reasons and quantify the impact of each factor causing the extraordinary \$0.02716/kwh fuel cost in that month;
- (b) Please identify and provide supporting documentation for all circumstances and factors contributing to extraordinary level of the actual fuel expenses for May 2004;
- (c) Please explain in detail and provide documentation for all efforts undertaken by PEC during May 2004 to address and mitigate the impact of higher than normal usage and higher than normal fuel expenses.

NUC-1-35 Please provide the following information for all existing and/or proposed natural gas contracts that have supplied, or will supply, natural gas to PEC during the historical and forecast periods.

- (a) The name of the vendor/supplier;
- (b) The start and end dates of the contract;
- (c) The contract identification number and status (*i.e.*, executed or in negotiation);
- (d) For contracts in negotiation, the status of the negotiations and the anticipated completion date; and
- (e) The "minimum" and "maximum" gas volumes per the contract;

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- NUC-1-36 Please describe in detail the current status of Surface Transportation Board's ruling regarding rates charged by Norfolk Southern to provide coal transportation to Progress Energy and other consumers of coal.
- NUC-1-37 For each electricity sales forecast prepared by the utility over the past 5 years, please provide:
- (a) The forecasted monthly sales;
 - (b) The monthly sales that actually occurred during the historical month; and
 - (c) A calculation of the forecasting error
- NUC-1-38 For each coal price forecast prepared by the utility over the past 5 years, please provide:
- (a) The forecasted average coal price;
 - (b) The price actually paid for coal during the historical month; and
 - (c) A calculation of the forecasting error.
- NUC-1-39 For each natural gas price forecast prepared by the utility over the past 5 years, please provide:
- (a) The forecasted average natural gas price;
 - (b) The price actually paid for natural gas during the historical month; and
 - (c) A calculation of the forecasting error.
- NUC-1-40 Provide the historical level of PEC's fuel factor by year in South Carolina since 1980.
- NUC-1-41 Identify and provide all documents provided to the South Carolina PSC, the South Carolina ORS, the North Carolina Utilities Commission, and/or the North Carolina Public Staff related to PEC's fuel costs since January 1, 2004.
- NUC-1-42 Explain in detail and quantify each factor leading to the increase in fuel costs:
- (a) During the historical period over the cost forecast for this same period during the fuel proceeding in 2004
 - (b) During the forecast period over the historical fuel costs
- NUC-1-43 Describe in detail PEC's specific expectations as to its price of coal and natural gas for the forecast period, for the period July 2006 to June 2007, and for the period July 2007 to June 2008. Identify and provide all documents supporting this view. Describe in detail PEC's plans to mitigate expected price increases and the status of these plans.
- NUC-1-44 Quantify the cost impact to PEC of any increases in rail prices since January 1, 2004 and explain how these increases are reflected in PEC's historical and forecast period costs. Provide a workpaper showing the details of this impact and

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2005-1-E
NUCOR'S FIRST SET OF DATA REQUESTS

the historical and forecast period costs of such rail transportation. Describe in detail PEC's plans to mitigate any price increases and the status of these plans.

/s/ Thomas S. Mullikin

Thomas S. Mullikin
Moore & Van Allen, PLLC
100 North Tryon Street
Suite 4700
Charlotte, NC 28202
(704) 331-3580

**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2005-1-E

In the Matter of:

**Carolina Power & Light Company d/b/a
Progress Energy Carolinas, Inc.
Annual Review of Base Rates
For Fuel Costs**

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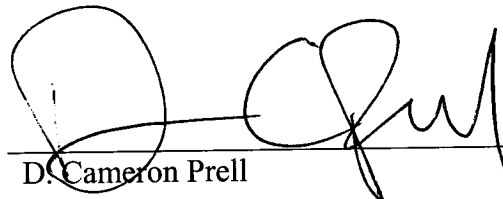
Certificate of Service

This is to certify that I, D. Cameron Prell, have this date served one (1) copy of the **NUCOR STEEL-SOUTH CAROLINA'S FIRST SET OF DATA REQUESTS TO PEC** in the above-referenced matter to the person(s) named below via first-class mail:

Len S. Anthony, Esq.
Progress Energy Services Company
P.O. Box 1551 / PEB 17A4
Raleigh, NC 27602

Florence P. Belser, Esq.
Wendy B. Cartledge, Esq.
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D. Cameron Prell

BRICKFIELD BURCHETTE
RITTS & STONE, PC

WASHINGTON, D.C.
AUSTIN, TEXAS

April 22, 2005

Len S. Anthony, Esq.
Progress Energy Services Company
P.O. Box 1551 / PEB 17A4
Raleigh, NC 27602

Re: Carolina Power & Light Company d/b/a Progress Energy Carolinas, Inc. –
Annual Review of Base Rates for Fuel Costs.
Docket No. 2005-1-E

Dear Len:

Please find enclosed and served upon you Nucor Steel-South Carolina's First Set of Data Requests in the above referenced matter. Please let me know if you have any questions.

Sincerely,



Garrett A. Stone
D. Cameron Prell

Enclosures

cc: Florence P. Belser, Esq.
Wendy B. Cartledge, Esq.
Benjamin P. Mustian, Esq.
Scott Elliott, Esq.